

Vitellaro, Chandra

From: Carole Cenci <CaroleC@pscleanair.org>
Sent: Tuesday, April 30, 2013 3:57 PM
To: Gerry Pade
Subject: FW: 2011 draft facility total Pb - external v2.xlsx

fyi

From: Strum, Madeleine [mailto:Strum.Madeleine@epa.gov]
Sent: Tuesday, April 30, 2013 3:30 PM
To: Carole Cenci
Cc: Houyoux, Marc; Narvaez, Madonna
Subject: RE: 2011 draft facility total Pb - external v2.xlsx

Carole,

Thanks for the thorough investigation of the 2011 draft NEI lead emissions value of 0.54 tons for Saint-Gobain Containers Inc (Verallia) (EIS 4985311).

I should note that the 0.54 tonnage value is what the facility reported to the 2011 TRI. The TRI trend shown in http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=98134BLLNC5801E, shows the facility's self-reported lead emissions has been steadily increasing since 2008 and they are now over the threshold used for locating monitors.

Per the email below, you found that number to be realistic so there is no further reason to question the facility on their TRI reporting.

Thanks again for your investigation—it was very useful.

Madeleine Strum
U.S. Environmental Protection Agency
Emission Inventory and Analysis Group
919 541 2383 (voice)
919 541 0684 (fax)

From: Carole Cenci [mailto:CaroleC@pscleanair.org]
Sent: Tuesday, April 30, 2013 5:40 PM
To: Strum, Madeleine
Subject: FW: 2011 draft facility total Pb - external v2.xlsx

Hi Madeleine,
I'm new to this, but is the analysis below the type of thing you were looking for? Bottom line is that your numbers looked good.
Carole

From: Gerry Pade
Sent: Tuesday, April 30, 2013 2:17 PM
To: Carole Cenci
Subject: RE: 2011 draft facility total Pb - external v2.xlsx

Carole -

To the best of my knowledge, lead is not an ingredient in soda lime glass but it can be a trace contaminant. Columbia Analytical Services performed an analysis of the particulate collected during the 11/23/04 stack test. Lead amounted to <1 mg on 4 of the 5 filters they analyzed. The 5th (from Furnace No. 3) had 1.2 mg which was <0.78% of the mass. Furnace temperatures hover around 2800 F, which is near the boiling point of lead (3164F). Given that it cooks for about 24 hours, I would expect most of the lead in the raw materials to be emitted. Emission reporting isn't required under Section 7.09 of Regulation unless it exceeds 2 ton/yr. Furnace No. 3 has the highest annual PM emissions (~20 tons) and 0.78% of 20 ton/yr is only 0.16 ton/yr so it isn't reported. The EPA spreadsheet shows values ranging from 0.2 to 0.54 ton/yr for all 4 furnaces combined, which seems realistic to me, given the limited amount of data we have.

-Gerry

From: Carole Cenci
Sent: Tuesday, April 30, 2013 1:33 PM
To: Gerry Pade
Subject: 2011 draft facility total Pb - external v2.xlsx

Gerry – can you please look at this spreadsheet and review the lead emissions that EPA has down for Saint-Gobain? The EPA EI folks are looking for feedback on these numbers before May 8.

Thanks
Carole